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ABSTRACT

This manual establishes policies and procedures for the Child Nutrition (CN) Labeling Program, a voluntary federal program run by the United States Department of Agriculture. The program is responsible for reviewing a product formulation to determine the contribution a single serving of that product makes toward the child nutrition meal pattern requirements. Meal pattern requirements specify foods and minimum amounts that must be served in institutions participating in child nutrition programs (for example, the school lunch program). Procedures described here apply to juice drinks and juice drink products and to food products served in main dishes that contribute significantly to the meat or meat alternate component of the meal pattern. These guidelines were developed to assist food service directors in determining the actual contribution of commercially prepared items such as beef patties and combination items (burritos, pizza, etc.) toward meal pattern requirements. This manual also specifically details information on the development of the CN Labeling Program; eligibility criteria to be met for products to receive a CN Label Statement; instructions on how to identify a CN label; penalties for misusing the CN logo; the advantages of using CN labeled products; what a CN label does not mean; the basis for crediting meat, poultry and seafood products; and how to submit a label application. (CB)

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United States
Department of
Agriculture

Food and
Nutrition
Service

FNS-245

The Child Nutrition Labeling Program:

An Overview

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Contents

Introduction..... 1

Background..... 1

Eligibility Criteria for a Product with a CN Label Statement..... 2
- Eligible Products..... 2
- Product Contribution..... 2
- Federal Inspection..... 2
- Food Buying Guide..... 3
- Product Samples..... 3

How To Identify a CN Label..... 3
- Label Statement..... 4

Penalty for Misuse of CN Logo..... 5

Advantages of Using CN-Labeled Products..... 6
- Warranty..... 6
- Meal Pattern Contribution..... 6

What A CN Label Statement Is Not..... 7

Basis for Crediting Meat, Poultry, and Seafood Products..... 7

Label Applications and Review Procedures..... 9
- What to Submit..... 9
- How to Submit..... 9

References..... 11

Introduction

The Child Nutrition (CN) Labeling Program is a voluntary Federal labeling program run by the U.S. Department of Agriculture (USDA). This program is responsible for reviewing a product formulation to determine the contribution that a single serving of that product makes toward the child nutrition meal pattern requirements. The meal pattern requirements specify the foods and the minimum amounts that must be served in institutions participating in the child nutrition programs.

This publication establishes policies and procedures for the CN Labeling Program. These procedures supersede all other instructions, written or oral, that the Food and Nutrition Service (FNS) of USDA has provided. The guidance material in this publication has been prepared for food manufacturers, food service directors, State agencies, and Federal regional offices.

The procedures in this manual apply to the following:

- Food products that contribute significantly to the meat/meat alternate component of the meal pattern and are served in main dishes. Meat/meat alternates include lean meat, poultry, fish, cheese/cheese alternates, eggs, cooked dry beans and peas, peanut butter, vegetable protein products, protein fortified macaroni, or any combination of these.

- Juice drinks and juice drink products that contain a minimum of 50 percent full-strength juice.

The products listed above must be inspected by one of the following Federal agencies:

Food Safety and Inspection Service (FSIS) of USDA
Agricultural Marketing Service (AMS) of USDA
National Marine Fisheries Services (NMFS) of the U.S. Department of Commerce (USDC)

Background

During the 1970's, advances in food technology and marketing increased the availability and use of commercially prepared products such as beef patties and combination items

(burritos, pizzas, etc.) in the child nutrition programs. These products posed a problem for food service directors. It was difficult at the point of sale to determine their actual contribution toward meal pattern requirements and to assure compliance with Federal regulations for serving specific amounts of foods. This fact, coupled with the anticipation of increased sales of these products to child nutrition programs, prompted FNS to form an evaluation committee to determine a means for properly evaluating the contribution of these kinds of products toward the meal pattern requirements. The committee, composed of FNS and USDA's FSIS staff, worked together to establish and implement a program to review and monitor such products.

Eligibility Criteria for a Product with a CN Label Statement

Eligible Products

The CN Labeling Program is limited to juice drinks, juice drink products, and products that contain food items which contribute to the meat/meat alternate component of the meal pattern and are part of the main dish. The meat/meat alternate products may also contribute to the bread/bread alternate and/or vegetable/fruit component of the meal pattern. The chart below indicates a product's minimum contribution toward the meal pattern requirements.

Product Contribution

Product	Minimum Contribution Toward Meal Pattern	Increment Expression
meat, poultry, seafood, nonmeat products	0.50 oz equivalent meat/meat alternate	0.25 oz
juice drinks juice drink products	2 oz (1/4 cup) single-strength juice	
meat/meat alternate with bread/bread alternate contribution	1/4 serving bread/bread alternate	1/4 serving
meat/meat alternate with vegetable/fruit contribution	1/8 cup vegetable/fruit	1/8 cup

Federal Inspection

All CN-labeled products must be produced under an appropriate USDA or USDC Federal inspection program to ensure that the label statement accurately reflects the amount of each ingredient used in the product. This will help protect local food service directors from exaggerated claims and will ensure that manufacturers with CN-labeled products are competing for sales on a common basis.

Food Buying Guide

Yield data from the Food Buying Guide for Child Nutrition Programs (Food Buying Guide), Program Aid Number 1331, 1984, is used for calculating a CN-labeled product's contribution toward meal pattern requirements. Using yields from the Food Buying Guide will help ensure that various meat/meat alternate items, regardless of cooking methods used or the addition of other ingredients, will be nutritionally equivalent.

The Department continues to review and study yield data for meat/meat alternates and other food items served in the child nutrition programs, and, when warranted, considers additions and changes in the Food Buying Guide.

Product Samples

FNS may request a sample of the product as part of the review process. If a sample is requested, final label approval may be delayed until the sample is received and reviewed. Label applications must be for products that have been made and tested in a pilot plant or on an assembly line.

How to Identify a CN Label

A CN label must have the following information printed on the principal display panel of the label:

- CN label statement
- Product name
- Ingredient listing in descending order of predominance by weight for all ingredients
- Establishment number (meat, poultry, and seafood items only)
- Manufacturer's or distributor's name and address
- Inspection legend for the appropriate inspection (see below)

Red Meat Products

Poultry Products

Seafood Products

Nonmeat Products

(eggs, cheese, beans, and peanut butter)

Inspected by the
U.S. Department of Agriculture
in Accordance with
FNS Requirements

Juice Drink and Juice Drink Products

Label Statement

The CN label statement must be an integral part of the product label and must include the following information:

1. The CN logo which is a distinct border around the CN statement.

2. A six-digit product identification number assigned by FNS which will appear in the upper right-hand corner of the CN label statement.

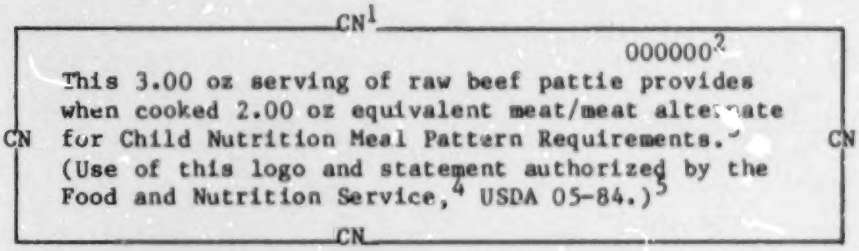
3. The statement of the product's contribution toward meal pattern requirements for the child nutrition programs. This identifies the contribution of a specific portion of a meat/meat alternate product toward the meat/meat alternate, bread/bread alternate, and/or vegetable/fruit component of the meal pattern requirements. It also identifies the contribution that juice drinks and juice drink products make toward the vegetable/fruit component of the meal pattern requirements.

4. A statement specifying that the use of the logo and CN label statement is authorized by FNS.

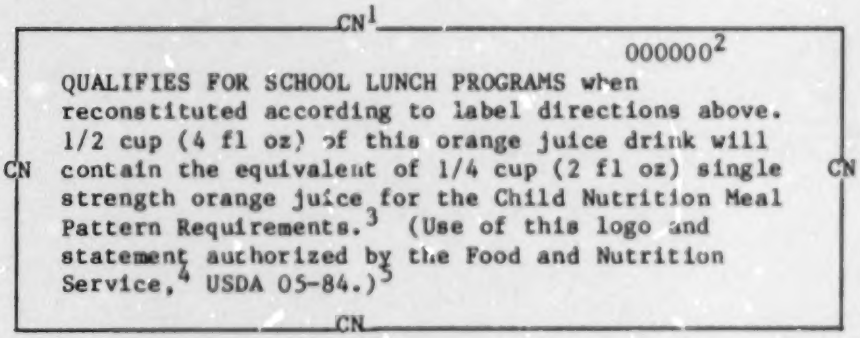
5. The month and year the label was approved in final by FNS.

The samples printed below show the general location for each component of the CN label statement.

Meat Product


CN[1]
000000[2]
This 3.00 oz serving of raw beef pattie provides when cooked 2.00 oz equivalent meat/meat alternate for Child Nutrition Meal Pattern Requirements.[3]
(Use of this logo and statement authorized by the Food and Nutrition Service,[4] USDA 05-84.)[5]
CN
CN
CN

Juice Drink Product


CN[1]
000000[2]
QUALIFIES FOR SCHOOL LUNCH PROGRAMS when reconstituted according to label directions above. 1/2 cup (4 fl oz) of this orange juice drink will contain the equivalent of 1/4 cup (2 fl oz) single strength orange juice for the Child Nutrition Meal Pattern Requirements.[3] (Use of this logo and statement authorized by the Food and Nutrition Service,[4] USDA 05-84.)[5]
CN
CN
CN

Penalty for Misuse of CN Logo

FNS has developed a logo to protect the integrity of the CN Labeling Program, to avoid possible abuse, and to make the CN label statement easy to identify. The logo is a distinctive border design that surrounds the label statement. Companies will not be allowed to use the logo or statement without permission from FNS.

If a company uses the CN logo inappropriately, FNS will notify it and give it 30 days to discontinue use of the logo. If the company continues to use the label, its name

will be put on a list that will be sent quarterly to all FNS Nutrition and Technical Services regional offices. Regional offices will then circulate the list to the States. In addition, other actions may be taken.

Advantages of Using CN-Labeled Products

Warranty

All CN-labeled products that are Federally approved and have a CN logo carry a warranty. If a food service authority participating in the child nutrition programs purchases such a product and uses it according to the directions, the institution will not have an audit claim filed against it, for that CN-labeled product, for noncompliance with the meal pattern requirements. If a State or Federal auditor finds that a CN-labeled product does not actually meet meal pattern requirements claimed on the label, the auditor will report this finding to the FNS national office. FNS will prepare a report on the findings and send it to the appropriate division of FSIS, AMS, NMFS, Food and Drug Administration (FDA), or the Department of Justice for action against the company. That office will then be responsible for auditing production records to determine whether the product, as produced, met the conditions of the CN label statement before it left the plant. If the audit shows that the product, as produced, does not meet the label statement, any or all of the following actions may be taken:

- The company's CN label may be revoked for a specific period of time;
- The appropriate agency may pursue a misbranding or mislabeling action against the company producing the product;
- The company's name will be circulated to FNS regional offices; or
- FNS will require the food service program involved to notify the State office of the labeling violation.

Meal Pattern Contribution

The CN label statement tells how the labeled product can be "credited" or "counted" towards meeting the meal pattern requirements of the child nutrition programs.

What a CN Label Statement Is Not

A CN label statement does not do the following:

- Assure that a product is "good for children."
- Assure that a product is "acceptable" to children.
- Suggest that products without CN statements are inferior.

Manufacturers must not use the CN label statement to promote a product's nutritional value or acceptability.

The CN label statement should not be confused with fact sheets and letters of certification. Letters of certification are statements provided by a company official that tell a product's contribution towards the meal pattern requirements. These may contain pertinent information but are not recognized by auditors as official documentation of the product's contribution towards meal pattern requirements. These letters and fact sheets have not been reviewed by FNS and may or may not be accurate. Label statements approved at the State level for State-inspected plants also are not reviewed by FNS. State approved labels and fact sheets are not covered by the CN label warranty.

Basis for Crediting Meat, Poultry, and Seafood Products

Meat, poultry, and seafood products used in the Child Nutrition Programs are credited on the raw basis using the appropriate cooking yields listed in the Food Buying Guide. This is done to provide equity in crediting different types of products regardless of the cooking methods used or the addition of binders or extenders. This in turn provides for comparable nutritional value (e.g., protein content) of a product when it is cooked by several different methods. For example, suppose ground beef patties weighing 3 ounces are cooked three different ways: (a) Pan fried, (b) oven broiled, and (c) grilled. Their cooked weights are 2.20 ounces, 2.75 ounces, and 2.63 ounces, respectively. If these patties were to be credited according to their cooked weights, pattie (b) would receive more credit than pattie (a) or (c) even though all the patties were prepared with exactly the same amount of meat. The variation in cooked weights is due to differences in fat and water losses with only a minimal loss of nutrients.

Let's take this example one step further. Assume that 3-ounce beef patties are cooked by the same methods described above, but these contain 28 percent hydrated soy protein flour. The presence of the soy protein flour will decrease the amount of fat and water lost during cooking; therefore, the cooked weights of the beef-soy patties will be greater than the cooked weights of the all-beef patties. The nutritional value of the beef-soy patties, as served, is not greater. Their higher weights reflect an increased retention of fat and water only.

How to calculate the actual credit that these various patties receive depends not on their cooked weight but on their raw weight and appropriate cooking yield from the Food Buying Guide. In order to provide equity in crediting meat/meat alternate products, regardless of cooking methods, FNS credits meat/meat alternate products on the raw basis and uses the term "equivalent meat" for crediting.

As the above examples imply, the basic concept underlying product crediting in the Child Nutrition Program is "nutrient concentration"--the amount of nutrients by weight in a finished cooked product. When a product is cooked, fat and water are lost while the essential nutrients are retained in a slightly more concentrated form. The following table shows the difference in nutrient concentration of a 4-ounce raw pattie and a pattie that weighs 4 ounces after cooking.

Comparison of Nutrient Concentration in a 4-Ounce Raw Ground Beef Pattie and a Pattie Weighing 4 Ounces After Cooking

Nutrient	Raw Ground Beef Pattie (4 oz)*	Cooked Ground Beef Pattie (4 oz)**	Difference between Raw and Cooked Patties
Protein	20.30 g	27.45 g	26.10% more
Iron	3.05 mg	3.62 mg	16.00% more
Thiamin	0.09 mg	0.10 mg	10.00% more
Riboflavin	0.18 mg	0.24 mg	25.00% more
Niacin	4.87 mg	6.12 mg	20.50% more
Water	15.05 %	13.55 %	10.00% less
Fat	24.05 %	23.02 g	4.30% less

*Ground Beef (no more than 24 percent fat)
**Cooking Methods: oven broiled, pan broiled, or sauteed

Data derived from Agriculture Handbook No. 456, Nutritive Value of American Foods, 1975.

Throughout this explanation, protein has been used as an indicator of nutritional value. While protein is one of the primary nutrients supplied by meat/meat alternate products, there are two other important nutrients, thiamin and iron, which are supplied through these products. A 1981 USDA study, the National Evaluation of School Nutrition Programs, showed that thiamin and iron frequently fail to meet the nutritional goal of the National School Lunch Program (NSLP). The goal of the NSLP is for school lunches to meet an average of one-third of the Recommended Dietary Allowances for certain key nutrients. Therefore, it is important to remember that the meat/meat alternate products that are served daily provide different quantities of nutrients, in addition to protein, which contribute significantly to the overall nutritional content of the school lunch.

Label Applications and Review Procedures

What to Submit

Application and review procedures vary depending on the type of product. FNS will issue detailed application procedures as separate manuals for various types of products for obtaining CN label approval. Manufacturers should request the manual that pertains to their specific needs. The following procedural manuals will be available:

Child Nutrition Labeling for Meat and Poultry Products.

Child Nutrition Labeling for Seafood Products.

Child Nutrition Labeling for Nonmeat Products.

Child Nutrition Labeling for Juice Drinks and Juice Drink Products.

Each manual will contain procedures, sample label submittals, and supplementary information.

How to Submit

All CN label applications for meat, poultry, and nonmeat products[1] (except nonmeat products produced in a seafood plant) must be submitted to:

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[1]Nonmeat products may contain cheese, eggs, dry beans or peas, peanut butter, cheese alternates, protein fortified macaroni, or any combination of these.

CN Label Reviewer
U.S. Department of Agriculture
Food and Nutrition Service
Nutrition and Technical Services Division
3101 Park Center Drive, Room 602
Alexandria, Virginia 22302
(703) 756-3556

Once FNS reviews and approves these labels, it forwards them to the appropriate agency for review where appropriate.

All CN label applications for seafood products or nonmeat products produced in USDC plants must be submitted to:

Approving Officer
National Seafood Quality and Inspection
Laboratory
P.O. Drawer 1207
Pascagoula, Mississippi 39567

Once the approving officer reviews the applications, he or she forwards the applications to FNS for concurrence. FNS then returns the applications to the approving officer.

All CN label applications for juice drinks and juice drink products must be submitted to:

CN Label Reviewer
U.S. Department of Agriculture
Food and Nutrition Service
Nutrition and Technical Services Division
3101 Park Center Drive, Room 602
Alexandria, Virginia 22302
(703) 756-3556

Once FNS reviews and approves the applications, it forwards them to AMS for concurrence. If AMS concurs, it will notify the appropriate AMS regional office and area field office. FNS notifies the manufacturers that the label has been given final approval. If either the formula or the label is not given final approval, FNS will send the application materials back to the manufacturer for revision.

References

The majority of CN-labeled products are used in the National School Lunch Program. Manufacturers need to understand the regulations for this program. A reprint from the Federal Register of the NSLP regulations is available from the Nutrition and Technical Services Division, FNS.

Manufacturers need to understand the school lunch meal pattern requirements in order to successfully complete an application for a CN label. A chart summarizing the school lunch meal patterns is available from the Nutrition and Technical Services Division, FNS.

This is an equal opportunity program. If you believe you have been discriminated against because of race, color, national origin, sex, age, or handicap, write immediately to the Secretary of Agriculture, Washingon, DC 20250.